

**Comments of GridLiance West LLC on  
CAISO's 2020-2021 Transmission Planning Process Meeting on 2/28/20**

March 13, 2020

GridLiance West LLC (GLW) appreciates the opportunity to comment on the stakeholder meeting held on February 28, 2020, regarding CAISO's Draft Study Plan for the 2020-2021 Transmission Planning Process (TPP). GLW appreciates the detailed presentation that CAISO prepared for this stakeholder meeting and references specific slides from that presentation in these comments.

**Encouragement to Include Necessary Transmission Elements in Base Case Model to Accommodate Renewable Buildout on GLW System**

GLW encourages the CAISO to include any transmission elements necessary to accommodate renewable buildout in the GLW system as part of its reliability base case model. In the 19/20 TPP, GLW noticed that the CAISO considered RAS and other non-wires solutions to manage flows from GLW-area renewables, but that in the course of the economic study the CAISO included phase angle regulators to ensure that flows on the adjacent NVE system would not have significant adverse impacts. If the CAISO believes phase angle regulators or other similar transmission equipment is required, then GLW requests that the CAISO includes these elements as part of its base case model for the reliability, policy and economic studies.

**Comment on Mapping of CPUC Resources to GLW Footprint**

The CAISO has identified sensitivities in the GLW footprint to the mapping of the CPUC's Southern Nevada portfolio resources. GLW is pleased to continue to work with the CAISO in whatever forms are most effective to ensure the mapping of CPUC resources to GLW buses allows for productive TPP studies.

**Request for Clarification of CAISO's Assessment Plans for the Expanded Energy-Only Case**

For the Policy Sensitivity Case 2, regarding Energy-Only (EO) expanded limits in TPP, GLW requests that the CAISO clarify how it will assess the acceptability of the expanded limits based on the congestion and curtailment the CAISO observes when conducting the expanded EO case. GLW encourages the CAISO to share ideas and consult with stakeholders regarding reasonable courses of action for possible outcomes. For example, GLW sees it unreasonable that at some arbitrary level of curtailment the full EO expansion would be deemed unacceptable. The tradeoffs of higher levels of siting and resulting curtailment should be economically based and thereby should not be all-or-nothing. Further the CAISO should consider various options to alleviate the curtailment and recognizing that lower EO limits change the renewable portfolio build out costs, the CAISO should not base the economic choices on congestion benefits alone. The CAISO providing resultant information to the CPUC on various possible increases in the EO limits and the estimated transmission buildout costs of each would allow RESOLVE to then incorporate both upgrade costs and buildout costs into the siting optimization. GLW looks forward to providing input to the CAISO as its expanded EO sensitivity study is conducted.

### Comment on CPUC Portfolio Resource Siting

As a general note, GLW appreciates the CAISO encouraging the CPUC to produce portfolios that are not radically changing because of extreme sensitivities. GLW has observed that very small changes in input assumptions in the RESOLVE model can drastically change the presumed buildout. The CAISO has encouraged the CPUC to ensure resilient, diverse generation sources. GLW has done the same in its comments with the CPUC and encourages the CAISO to continue to support improvements in the CPUC portfolios that better reflect rational resource siting.

We appreciate CAISO's consideration of these items.

Sincerely yours,

A handwritten signature in black ink that reads "Jody Holland". The signature is written in a cursive, flowing style.

Jody Holland  
Vice President, Transmission Planning